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February 6, 2006

## ELECTRONICALLY FILED

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Re: EB-06-TC-060/Filed in EB Docket No. 06-36  
Certification of CPNI Filing February 2, 2006


Dear Secretary Dortch:

On behalf of Locus Telecommunications, Inc. ("Locus"), its attorneys hereby file Locus' Certification of Compliance with Section 222 of the Communications Act and Commission Rules implementing Section 222. Locus makes this filing in response to the Commission's Public Notice, DA 06-223 (rel. January 30, 2006).

An additional copy of this filing is also enclosed, to be date-stamped and returned in the envelope provided.

Should there be any questions regarding this filing, kindly contact the undersigned.

Respectfully submitted,



Jonathan S. Marashlian

Enclosure

Service List:

cc: Byron McCoy  
Telecommunications Consumers Division  
Enforcement Bureau  
(electronically to: [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov))

Best Copy and Printing, Inc.  
Portals II  
445 12<sup>th</sup> Street, SW  
Room CY-B402  
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(electronically to: [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com))


**CERTIFICATION OF CPNI FILING FEBRUARY 2, 2006**

Locus Telecommunications, Inc.  
EB-06-TC-060  
EB Docket No. 06-36

**CERTIFICATE OF COMPLIANCE**

I, Sam Lee, being of lawful age and duly sworn on my oath, state that I am the Controller of Locus Telecommunications, Inc. ("Locus"). I am authorized by Locus to execute this certification on its behalf and do therefore state as follows:

I have personal knowledge that Locus' business methods and the procedures adopted and employed by Locus are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("the Act"), and the Federal Communications Commission's regulations implementing Section 222 of the Act, 47 C.F.R. § 64.2005, 64.2007 and 64.2009.

By:  SAM LEE

Title: CONTROLLER

Date: 2/2/2006

## **CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006**

Locus Telecommunications, Inc.  
EB-06-TC-060  
EB Docket No. 06-36

### **STATEMENT OF COMPLIANCE PROCEDURES**

Locus Telecommunications, Inc. ("Locus") is an established, leading provider of prepaid long distance, prepaid wireless, point-of-sale and carrier services. Always putting our customers first, we deliver reliable access to advanced, affordable telecommunications products and services that meet their needs at home and around the globe. Currently, our prepaid wireless and calling card products reach consumers through more than 60,000 locations nationwide. We serve more than 250,000 wireless customers and generate over 500 million network minutes per month.

As a provider of prepaid calling services, both wireline and wireless, which are offered predominantly to a transient public at retail outlets and kiosks, Locus is generally not privy to customer information such as name, address and other personal information because such information is not gathered at the point-of-sale. Locus' access to CPNI is generally limited to Call Detail Records and other data collected by its switches.

Nevertheless, Locus ensures that its business methods and operating procedures are in full compliance with FCC Rules pertaining to CPNI because there are occasions when Locus does collect CPNI, as is the case with Internet transactions and customer-initiated PIN activation.

Locus ensures that no information, CPNI or other, regarding our customers is ever sold or given to any third parties for any purpose, unless pursuant to lawful subpoena.

Locus ensures that a customer's approval to use CPNI is determined prior to its use.

Locus trains its employees regarding the appropriate use of CPNI and has established disciplinary procedures should an employee violate the company's policies.

Locus' internal network and onsite and offsite data are maintained securely through technology and other methods. All customer information is therefore protected from "hacking" and other forms of misappropriation.